



MIRANDA SLONE SKLARIN VERVENIOTIS LLP

MICHAEL A. MIRANDA*
STEVEN VERVENIOTIS
ONDINE SLONE
RICHARD S. SKLARIN^o
MAURIZIO SAVOJARDO
ANDREW B. KAUFMAN[±]
LAWRENCE S. WASSERMAN*

*ALSO ADMITTED IN NEW JERSEY
±ALSO ADMITTED IN DISTRICT OF COLUMBIA
^oRESIDENT IN WESTCHESTER

WRITER'S E-MAIL:
SVVERVENIOTIS@MSSSV.COM

THE ESPOSITO BUILDING
240 MINEOLA BOULEVARD
MINEOLA, NY 11501
TEL (516) 741-7676
FAX (516) 741-9060

WWW.MSSSV.COM

BRANCH OFFICES:
WESTCHESTER, NY
NEW YORK, NY
WOODBIDGE, NJ

SENIOR COUNSEL
LOUISE FASANO
ABRAHAM WARMBRAND
LAURA ALTO
GABRIELLA CAMPIGLIA

ASSOCIATES
RICHARD B. EPSTEIN
CHRISTOPHER J. LAMPERT*
BRANDON H. DORMAN
MICHAEL R. SEIDON
ANDRÉ S. HAYNES
JOSHUA A. SCERBO^o

March 14, 2023

Magistrate Judge Peggy Kuo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Courtroom 11C South
Brooklyn, New York 11201

Re: Falls Lake v. Kalnitech Construction Corp. et. al.
Docket No: 1:22-cv-01473-KAM-PK
Our File No: 19-208

Dear Judge Kuo,

I represent the plaintiff, Falls Lake National Insurance Company ("Falls Lake"), in this action, and I write today, to supplement yesterday's submission of a letter motion to extend discovery to inform the Court that Mr. Dachs also consents. The delay was that unfortunately, his mother died last week and he was not able to respond to our requests until later in the day yesterday.

Respectfully submitted,
MIRANDA SLONE SKLARIN VERVENIOTIS LLP

/S/ Steven Verveniotis

Steven Verveniotis

cc: All Counsel Via ECF